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June 24, 2025

VIA ECF

The Honorable Analisa Torres  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Sentencing Adjournment Request*  
United States v. Sandeep Grover et al., 24 Cr. 46 (AT)

Dear Judge Torres:

With the government's consent, Mr. Grover respectfully submits this letter for an adjournment from his current sentencing date of July 7, 2025 to a date convenient for the Court and parties. I understand from Chambers that the dates agreed upon by the government and defense, August 14<sup>th</sup> or 15<sup>th</sup> 2025 are unavailable.<sup>1</sup>

The bases for my current request are mainly my own, not Mr. Grover's. I am currently engaged on trial in New York County, Docket No. CR-011158-24NY. This Thursday, June 26, 2025, I have another sentencing submission due for an incarcerated client in EDNY, 23 cr. 516 (KAM). Next week, on July 3, 2025, I have Rule 29 and 33 reply briefs due on an EDNY case where we did a 5-week trial in January and February 2025 (22 cr. 464 AMD).<sup>2</sup>

Mr. Grover's sentencing submission was due yesterday; our office is still receiving support letters; and due to my schedule, we are not ready to file. As we are engaged on trial and have multiple engagements over the next few weeks, we have been unable to devote the time necessary to effectively represent Mr. Grover. A short adjournment would allow Mr. Grover to compile the necessary mitigation support and submit a completed sentencing memorandum. Thank you.

Respectfully Submitted,  
Varghese & Associates, P.C.

/s

By: Vinoo P. Varghese  
*Counsel for Mr. Sandeep Grover*

cc: Government via ECF; Probation Officer Pamela Flemen

<sup>1</sup> This is Mr. Grover's second sentencing adjournment request, the first seeking an extension until December wasn't granted (ECF 76).

<sup>2</sup> I will be flying to Japan on August 4 returning on August 13. My sons, ages 14 & 11 are playing for (amateur) Team USA Baseball in their respective age groups against Japanese teams based in Tokyo, Osaka, and Kyoto. We would have simply requested a 30-day adjournment, but 30 days from the current sentencing date would make it a date when I am in Japan for my sons' baseball tournament.